

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*
Plaintiffs,

v.

Civ. Action No.: 14-cv-00029-AB

National Football League and
NFL Properties, LLC,
successor-in-interest to
NFL Properties, Inc.,
Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

STIPULATION AND [PROPOSED] ORDER¹

This Stipulation and Agreement, dated January [17], 2017, is made and entered into by and among the National Football League and NFL Properties LLC (the "NFL Parties"), and Class Counsel (collectively, the "Parties").

WHEREAS, on April 22, 2015, this Court issued a Memorandum (ECF No. 6509) and Final Order and Judgment (ECF No. 6510), and on May 8, 2015, an amended Final Order and Judgment (ECF No. 6534), approving the Settlement Agreement in its entirety;

¹ Unless otherwise noted, the terms used in this Order that are defined in the Settlement Agreement have the same meanings in this Order as in the Settlement Agreement.

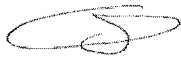
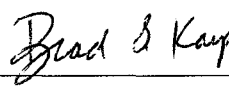

WHEREAS, on May 4, 2015, Claims Administrator BrownGreer PLC, in accordance with the Final Order and Judgment and the Settlement Agreement, filed the list of Opt Outs who timely submitted proper requests to opt out in compliance with Section 14.2(a) of the Settlement Agreement, including Retired NFL Football Players Ralph Williams, Lex Hilliard and Brian Schaefering (ECF No. 6533);

WHEREAS, Ralph Williams, Lex Hilliard and Brian Schaefering have since submitted a written request seeking to revoke their Opt Out requests (*see* Exhibit 1 (Declaration of Orran L. Brown, Sr.));

WHEREAS, the Parties have agreed to accept the revocation requests submitted by Ralph Williams, Lex Hilliard and Brian Schaefering, subject to Court approval, because they submitted the requests before Opt Out litigation has commenced in this Court;

AND NOW, this [17] day of January, 2017, it is hereby stipulated and agreed by the Parties that the revocation requests submitted by Ralph Williams, Lex Hilliard and Brian Schaefering are accepted, subject to Court approval, because they submitted the requests before Opt Out litigation has commenced in this Court.

It is so **STIPULATED AND AGREED**,

By:  By:  
Date: 1/17/17 Date: 1/17/17

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Class Counsel

Counsel for the NFL Parties

It is so **ORDERED**, based on the above Stipulation and the accompanying Declaration of Orran L. Brown, Sr., that the revocation requests submitted by Ralph Williams, Lex Hilliard and Brian Schaefering are approved and the Claims Administrator is **DIRECTED** to post a revised list of Opt Outs forthwith excluding Ralph Williams, Lex Hilliard and Brian Schaefering.

ANITA B. BRODY, J.

Copies **VIA ECF** on _____ to:

Copies **MAILED** on _____ to: